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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON DAVID KIRSCHNER,

Defendant.

INDICTMENT

Count 1: 18 U.S.C. § 875(c), Interstate  
Transmission of Threat to Injure

Count 2: 18 U.S.C. 18 U.S.C. § 2261A(2),  
Cyberstalking

Count 3: 18 U.S.C. 18 U.S.C. § 2261A(2),  
Cyberstalking

The Grand Jury charges:

Case: 2:22-cr-00118  
Assigned To : Campbell, Tena  
Assign. Date : 4/6/2022

COUNT 1

18 U.S.C. § 875(c)  
(Interstate Transmission of Threat to Injure)

On or about March 24, 2022, in the District of Utah,

AARON DAVID KIRSCHNER,

defendant herein, did knowingly transmit in interstate commerce a communication containing a threat to injure the person of another, Person A, to wit: "I will make sure that you never have the opportunity to ignore another veteran ever again....," and "oh wait I forgot if you are not at the operators desk when I call then you had god better not show

up ever again because I have no problem putting a bullet in your head as well as mine,” and “You will immediately have any pending police intervention canceled...Any deviation will result in your body count increasing”: all in violation of 18 U.S.C. § 875(c).

COUNT 2  
18 U.S.C. 18 U.S.C. § 2261A(2),  
(Cyberstalking)

On or about March 24 through March 29, 2022, in the District of Utah,

AARON DAVID KIRSCHNER,

defendant herein, with the intent to kill, injure, harass, and intimidate, used any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate commerce to engage in a course of conduct that placed Person A in reasonable fear of death and serious bodily injury, and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Person A; all in violation of 18 U.S.C. § 2261A(2).

COUNT 3  
18 U.S.C. § 2261A(2)  
(Cyberstalking)

On or about March 24 through March 29, 2022, in the District of Utah,

AARON DAVID KIRSCHNER,

defendant herein, with the intent to kill, injure, harass, and intimidate, used any interactive computer service and electronic communication service and electronic

communication system of interstate commerce, and any other facility of interstate commerce to engage in a course of conduct that placed Person B in reasonable fear of death and serious bodily injury, and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Person B; all in violation of 18 U.S.C. § 2261A(2).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

ANDREA T. MARTINEZ  
United States Attorney

A handwritten signature in black ink, appearing to read 'Cameron P. Warner', written over a horizontal line.

CAMERON P. WARNER  
Assistant United States Attorney